

**BEFORE THE
FEDERAL COMMUNICATIONS DIVISION
WASHINGTON, DC**

In the Matter of)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

**REPLY COMMENTS OF
INTERNATIONAL BUSINESS MACHINES CORPORATION**

I. Maintenance and Technical Support (Basic Maintenance)

IBM has two comments on this section, and appreciates the FCC’s assistance in clarifying these items.

First, regarding the statement from the text that “On-site technical support” is ineligible, IBM presumes that it is the FCC’s intention to prohibit technicians from being “stationed” at the entity in question, not to prohibit a technician from coming on-site in response to an eligible incident. Many network issues require the presence of qualified engineering personnel to effectively diagnose or repair.

Second, IBM believes that the following types of services should be included as eligible under the heading of Basic Maintenance:

Account Management – moves, adds, and changes to email and directory services accounts.

Preventative Maintenance – tasks analogous to an “oil change” on a car – standard industry accepted practices such as running directory maintenance tools, disk defragmentations, periodic equipment cleanings, etc.

Software Management – Code updates, revision and patch management for eligible software, i.e., router code.

Reporting – Periodic status reporting and trouble ticket tracking.

Recurring Software Licenses – yearly MS Exchange license fees, etc.

Project Management/Lead Technical Staff – to effectively administer a field team of the size necessary to support a large district, some staff management hours are required. This would apply only to the hours necessary to coordinate the various tasks and skills in a large and complex environment, not to establish a service before it is needed. IBM respectfully requests the FCC clarify its position regarding the eligibility of supervisory hours, and if they are deemed eligible, provide guidelines.

II. Virus Protection

IBM believes that virus protection should be included as an eligible service, and does not represent an expansion of the existing rules, but merely a reinterpretation of them. There are three fundamental reasons why virus protection should be included: Precedent, Need, and Cost Savings. First, the FCC and SLD have set a precedent where some equipment that does not enable the transport of information, but prevents such equipment from stopping functioning due to external factors is considered eligible, such as the Uninterruptible Power Supply (UPS) and the Firewall. A UPS allows equipment to function during a power outage, while a firewall protects a network from unauthorized intrusion from the outside. Philosophically, a piece of equipment which removes viruses before they can penetrate the network fulfills the same function. Second, IBM estimates that more network problems are caused by viruses than by

power outages and external attacks combined. Third, since many virus outbreaks have effects which duplicate network problems, resulting in many wasted hours of eligible network diagnostic services, IBM speculates that the modified adage, “An ounce of virus prevention equals a pound of eligible cure” applies.

III. Virtual Private Networks (VPN)

IBM believes that the equipment to allow customers to secure their own data by creating a Virtual Private Network, or VPN, should be eligible. Educational institutions are under many of the same pressures that hospitals and banks are under to ensure the privacy of the data they manage. FERPA, or the Family Educational Rights and Privacy Act, deals with the privacy of student information, and details what is and is not appropriate access to student information, and because schools must maintain medical records of students, HIPAA applies as well. In addition, using VPN technology can be the most cost-effective method for a school district to create a WAN. Without VPN technology, it will be difficult for schools to take full advantage of the internet to change some of their core educational and administrative processes, and realize the full potential of the technology the E-rate has provided.